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A Policy Is Needed to Help Control Children's Exposure to Lead

To the Editor:

Prof. Claire Ernhart asserts (letter, June 1) that her review of the scientific evidence for effects of low-level lead exposure on children's learning and behavior came to the conclusion that such effects, if any, are minimal. She adds that "those who disagree" with her position "have been unable to provide an effective rebuttal."

Dr. Ernhart neglected to mention an important fact: When she appeared at hearings before the Environmental Protection Agency in April to make the same argument, she did so on behalf of the Lead Industries Association.

Moreover, at these E.P.A. hearings (on proposals to relax or repeal rules on lead in gasoline), I presented a concise rebuttal to her analysis. Others have done so on other occasions as well. Without going into scientific detail, here is the essence of the counter-argument:

- There is a mounting body of evidence, consisting of a handful of reasonably well-designed human studies and much supporting data from neurochemical and behavioral studies in laboratory animals, which suggests that low-level exposure to lead does indeed have subtle effects on behavior and learning ability. The growing consensus of scientific authorities is that this evidence is sufficiently persuasive to be taken very seriously.

- It is wholly unrealistic to expect that any study of something as complex as human behavior and learning can be free of methodological "weakness." There will always be potential confounding explanations for differences in intelligence among children, and no amount of care can design an experiment that can completely rule out such uncertainty. This is a simple

fact of life to researchers in the field, and Dr. Ernhart's "new" analysis belabors an old and obvious truth.

- Criticisms of methodology cannot be construed as evidence that lead does not have adverse effects on intelligence. They can only point out the difficulty of establishing this beyond a doubt.

- The crucial question is one of public policy. If science cannot provide absolute proof that lead harms children's minds, although much evidence suggests it may, what should society do about exposure to lead? We have two choices:

- We can take costly steps to reduce exposure of children to lead, as urged by the overwhelming majority of medical experts who testified before the E.P.A. If the experts are wrong, and in fact lead has no harmful effects, society could waste millions of dollars on measures that don't really protect health.

- On the other hand, we could delay action until there is far more compelling evidence of lead's harmful effects. No matter how much evidence

accumulates, however, it will always be subject to some uncertainties that permit the essentially obstructionist argument Ernhart advances. While we delay, society risks wasting the potential intellectual capabilities of hundreds of thousands of children.

Which risk is more acceptable? To me, the answer is clear. But it hinges on a moral judgment, not a scientific one. That moral dimension is something Dr. Ernhart — and the lead industry for which she speaks — seem unable or unwilling to confront.

In a 1980 report, which I helped write, a committee of experts from the National Academy of Sciences took that issue head-on. The committee concluded, "Inaction because of uncertainties is unacceptable in the case of lead in the environs of urban children."

That is a judgment society should fall back on as we wrestle with policies for controlling exposure to lead.

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